

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

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IN THE MATTER OF THE SEIZURE  
WARRANT FOR UP TO \$83,000.00 IN FUNDS  
ON DEPOSIT IN JP MORGAN CHASE BANK  
ACCOUNT ENDING IN #3703 HELD IN THE  
NAME OF PETER UDEOGARANYA

Case No. 19-M-031

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**AFFIDAVIT IN SUPPORT MOTION TO SEAL**

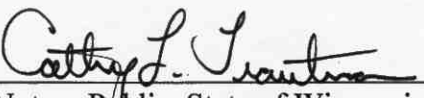
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1. I am an Assistant United States Attorney in the Eastern District of Wisconsin, and one of the prosecutors assigned to the above-captioned matter.
2. On March 29, 2019, this Court, by the Honorable William E. Callahan, Jr., issued a seizure warrant authorizing the seizure of the above-referenced funds. The warrant was issued on the application and affidavit of Special Agent Zachary Hoalcraft of the United States Secret Service.
3. The affidavit of Special Agent Hoalcraft submitted in support of this application details the United States' ongoing investigation into alleged violations of federal law in this district. The disclosure of the information set forth in Special Agent Hoalcraft's affidavit could compromise the effectiveness of the investigation by, among other things, causing the destruction of evidence or causing the two main targets – who are believed to have ties to a foreign country – to flee before they are apprehended.
4. This investigation will require the investigative team to conduct interviews and to obtain and review a large amount evidence and data, including financial records. That process will take several months.

Based on the foregoing, the United States respectfully requests that the Court seal the application for seizure warrant, including the affidavit in support of that application, as well as this affidavit, until October 15, 2019, or further order of this Court, to allow the United States to complete this investigation and to make appropriate charging and forfeiture decisions.

  
SCOTT J. CAMPBELL

Subscribed and sworn to before me  
this 9<sup>th</sup> day of April, 2019.

  
Notary Public, State of Wisconsin  
My commission: expires 08/30/19.

